MESTER & SCHWARTZ, P.C. Formed in the State of PA Jason Brett Schwartz, Esquire 1333 Race Street Philadelphia, PA 19107 Tel: (267) 909-9036 Fax: (215) 665-1393

E-mail: jschwartz@mesterschwartz.com

Attorney for Movant

ATTORNEY FOR MOVANT: BMW BANK OF NORTH AMERICA

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY CAMDEN DIVISION

IN RE:	8	CASE NO. 18-32439-JNP
	§	
TAKIDIA T. LIGON	§	CHAPTER 13
a/k/a TAKIDIA T JENNINGS, Debtor	§	

CERTIFICATION IN SUPPORT OF MOTION

The undersigned, a duly authorized representative for BMW Bank of North America, does hereby certify that:

- I am employed as a Bankruptcy Specialist by BMW Financial Services NA, LLC service
 provider for BMW Bank of North America ("Movant"), a Utah industrial bank and a wholly
 owned subsidiary of BMW Financial Services NA, LLC and am familiar with the account which
 the Movant maintains for the Debtor Takidia T. Ligon, and I am authorized to make this
 Certification.
- On or about August 14, 2015, Debtor Takidia T. Ligon entered into a Retail Installment Sales
 Contract ("Contract") involving a loan in the amount of \$27,822.65 for the purchase of a 2011
 BMW 3 Series Sedan 4D 328xi AWD.
- The vehicle secured by the Contract has V.I.N. WBAPK5G59BNN27089. See copy of Contract attached hereto and marked as Exhibit "A".
- 4. The Movant is the assignee of the Contract.
- 5. The Movant is the only lien holder of record with regard to the vehicle. See copy of the Certificate of Title attached hereto and marked as Exhibit "B".

- 6. The above-described vehicle is encumbered by a lien in favor of the Movant; the account has a payoff in the amount of \$10,764.08, plus other appropriate charges through November 05, 2019, though subject to change. The regular monthly payment is \$378.79 at an interest rate of 0.900%.
- 7. Pursuant to the provisions of the Contract, the Debtor Takidia T. Ligon has defaulted by failing to make payments and Movant is entitled to possession of the vehicle as a result of the default.

	a.	Contract Date:	August 14, 2015
	ъ.	Date of Last Payment:	December 28, 2018
	c.	Amount of Last Payment:	\$200.00
	d.	Last Payment Applied to Date:	May - Part. June 2019
	e.	Payment Amount:	\$378.79
	f.	Balance as of November 05, 2019:	\$10,764.08
	g.	Pre-Petition Arrears:	\$0.00
	h.	Post-Petition Arrears:	\$10,764.08
	i.	Other Fees and Charges	\$0.00
	j.	Attorney's Fees and Costs;	\$0.00
T	OTAL	POST-PETITION DELINQUENCY	\$10,764.08

 The Eastern Edition of N.A.D.A. Official Used Car Guide indicates and adjusted retail value of \$8,450.00. See copy of N.A.D.A. report and marked as Exhibit "C".

I CERTIFY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE. I AM AWARE IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE WILLFULLY FALSE, I AM SUBJECT TO PUNISHMENT.

DATED: 1-6-2019

Signature

Bankruptcy Specialist